

PRIVACY POLICY

Effective Date: **October 21, 2025**

Entity: **A2A Global Inc**, a Delaware Corporation (File No. 10050200)

NON-CUSTODY NOTICE: A2A Global Inc does not accept, hold, transmit, or settle funds. Licensed banks and MSBs manage all fund flows and conduct KYC, KYB, AML, CFT, sanctions screening, and related prudential regulatory obligations.

Scope and Role

This Policy explains how A2A Global collects, uses, shares, and protects personal information when you use the A2A Global Service/Platform. For regulated financial services (onboarding, screening, processing, settlement), Licensed Service Providers act under their own licenses and terms and are responsible for fund custody and movement.

Information We Collect

1. Identifiers and Contact Data: Name, email, phone, addresses, country, and organization details.
2. Account and Profile Data: Account credentials, roles, preferences, verification status.
3. Transaction Metadata: Payment link details, invoices, amounts, currency, method, timestamps, status, and non-sensitive descriptors.
4. Compliance and Risk Data: Screening results shared by providers, risk flags, audit logs, fraud signals, and information needed to support provider compliance.
5. KYC/KYB Data: Government IDs, entity records, ownership information, and related documents, where submitted to or shared with us to facilitate provider onboarding.
6. Technical and Usage Data: IP address, device and browser data, cookies, analytics, API usage, error logs.
7. Communications: Support requests, feedback, and notices.

Sources of Information

1. Directly from you during account creation, payment link generation, or support interactions.

2. Automatically from your devices through cookies and similar technologies.
3. From Licensed Service Providers and verification vendors for onboarding and compliance.
4. From publicly available sources and sanctions/watchlist providers.

How We Use Information

1. Provide, operate, and improve the Platform and features.
2. Facilitate interactions with Licensed Service Providers and support their onboarding and compliance requirements.
3. Detect, investigate, and prevent fraud, abuse, and security incidents.
4. Comply with legal obligations, including sanctions and AML/CFT requirements.
5. Communicate service updates, notifications, and transactional messages.
6. Perform analytics, reporting, and product development.

Legal Bases (where applicable)

1. Contract: To deliver the Platform at your request.
2. Legitimate Interests: To secure, improve, and operate the Platform and integrations.
3. Legal Obligation: To meet compliance, recordkeeping, and regulatory requests.
4. Consent: Where required for certain cookies, marketing, or specific data elements.

Sharing of Information

1. Licensed Service Providers and Banks to enable onboarding, screening, processing, and settlement.
2. Service Providers that perform hosting, analytics, customer support, security, and identity verification under contractual safeguards.
3. Corporate Transactions involving mergers, acquisitions, financing, or asset transfers.
4. Legal and Regulatory Authorities when required by law or to protect rights and security.

We do not sell personal data.

Cookies and Similar Technologies

1. We use cookies and similar tools for functionality, security, and analytics.

2. You may adjust browser settings to manage cookies. Some features may not function without them.

Data Retention

1. We retain data for as long as necessary to provide the Platform, comply with legal obligations, resolve disputes, and enforce agreements.
2. Retention periods vary by data type and legal requirements. Where feasible, we de-identify or aggregate data.

Security

1. We implement administrative, technical, and physical safeguards, including encryption in transit, access controls, monitoring, and least-privilege practices.
2. No system is completely secure; users should maintain good security hygiene.

International Data Transfers

- Where data is transferred across borders, we use appropriate safeguards consistent with applicable laws and contractual protections.

Your Privacy Rights

Depending on your jurisdiction, you may have rights to:

- A. Access, correct, or delete personal data.
- B. Object to or restrict certain processing.
- C. Port data in a structured, commonly used, machine-readable format.
- D. Withdraw consent where consent is the basis for processing.
To exercise rights or inquire, contact: **legal@a2a.global**
- E. We may verify your identity and may refer you to a Licensed Service Provider when it controls the relevant data.

Children's Data

- The Platform is not intended for children under 16. We do not knowingly collect data from children under 16.

Controller and Contact

Controller: A2A Global Inc

Email: legal@a2a.global

Mailing Address: A2A Global Inc, 131 Continental Drive, Suite 301, Newark, Delaware, United States, 19713

Changes to This Policy

- We may update this Policy. Material changes will be indicated by updating the Effective Date. Continued use of the Platform after changes indicates acceptance.